

1 DOWNEY BRAND LLP
2 ELIZABETH B. STALLARD (Bar No. 221445)
3 estallard@downeybrand.com
4 621 Capitol Mall, 18th Floor
5 Sacramento, California 95814
6 Telephone: 916.444.1000
7 Facsimile: 916.444.2100

8 Attorneys for Defendant
9 COMMONSPIRIT HEALTH
10

11 UNITED STATES DISTRICT COURT

12 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
13

14 JAMES PEARSON,
15
16 Plaintiff,

17 v.

18 KAISER FOUNDATION HOSPITALS; THE
19 PERMANENTE MEDICAL GROUP, INC., a
20 Corporation doing business in the State of
21 California; COMMONSPIRIT HEALTH, a
22 Colorado corporation, d/b/a ST. JOSEPH'S
23 BEHAVIORAL HEALTH; and DOES 1-20,
24 inclusive,

25 Defendants.
26

Case No. 2:20-cv-02335-MCE-KJN
Hon. Morrison C. England

**STIPULATION TO EXTEND FACT
DISCOVERY DEADLINE; ORDER**

27 Plaintiff JAMES PEARSON ("Plaintiff") and Defendant KAISER
28 FOUNDATION HOSPITALS, THE PERMANENTE MEDICAL GROUP, INC., and
Defendant COMMONSPIRIT HEALTH (collectively, "Defendants") hereby stipulate,
through their undersigned counsel, that the deadline to complete fact discovery be
continued 60 days from January 13, 2022, to March 14, 2022.

This Stipulation is being filed due to the following:

The Parties have been engaging in diligent and good faith efforts to schedule
depositions and conduct other non-expert discovery. However, due to Plaintiff's own
trial schedule (he is an attorney), Plaintiff is now unavailable for deposition until early

January. Defendants need to be able to complete Plaintiff's deposition, and the parties need to be able to reasonably follow up on issues and witnesses identified in this central deposition, in order to adequately prepare the case for trial. This will not be possible if the non-expert discovery deadline remains at January 13, 2022.

Moreover, moving the non-expert discovery deadline by only 60 days, to coincide with the expert witness disclosure deadline, will not impact any other case deadlines or the Court's calendar.

DATED: December 3, 2021

ALLACCESS LAW GROUP

By: /s/ Irakli Karbelashvili [as authorized on 12/3/21]

IRAKLI KARBELASHVILI

Attorney for Plaintiff

JAMES PEARSON

DATED: December 2, 2021

BUTY & CURLIANO LLP

By: /s/ Ondrej Likar [as authorized on 12/2/21]

ONDREJ LIKAR

Attorney for Defendants

KAISER FOUNDATION HOSPITALS and THE
PERMANENTE MEDICAL GROUP, INC.

DATED: December 3, 2021

DOWNEY BRAND LLP

By: /s/ Elizabeth B. Stallard

ELIZABETH B. STALLARD

Attorney for Defendant

COMMONSPIRIT HEALTH

DOWNEY BRAND LLP

ORDER

Having reviewed the Parties' stipulation, and good case appearing, IT IS HEREBY ORDERED that the deadline to complete non-expert discovery is confirmed to be March 14, 2022.

IT IS SO ORDERED.

Dated: December 6, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE

DOWNEY BRAND LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28